

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

HOMeward RESIDENTIAL, INC., solely
in its capacity as Master Servicer for the
Option One Mortgage Loan Trust 2006-2, for
the benefit of the Trustee and the holders of
Option One Mortgage Loan Trust 2006-2
Certificates,

Plaintiff,

- against -

SAND CANYON CORPORATION, f/k/a
Option One Mortgage Corporation,

Defendant.

Civil Action No. 12-CV-5067 (AT)

PLAINTIFF'S NOTICE OF MOTION FOR RECONSIDERATION

Upon the accompanying memorandum of law and all other papers and proceedings herein, Plaintiff Homeward Residential, Inc., hereby moves this Court pursuant to Local Rule 6.3 for an order granting reconsideration of this Court's March 31, 2014 Memorandum and Order (Docket # 51) to the extent that it granted Defendant's motion to dismiss Plaintiff's claim that Defendant breached its MLPA § 3.01(a)(16) representation that "[t]here is no material default, breach, violation or event of acceleration existing under the related Mortgage or the related Mortgage Note . . . other than a delinquency payment."

DATED: New York, New York
April 3, 2014

Respectfully submitted,

HUNTON & WILLIAMS LLP

By: /s/ Brian V. Otero
Brian V. Otero
Stephen R. Blacklocks

200 Park Avenue
New York, NY 10166
(212) 309-1000
botero@hunton.com
sblacklocks@hunton.com

Attorneys for Plaintiff Homeward
Residential, Inc.

DECLARATION OF SERVICE

Raymond E. Galbraith, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

I am a Litigation Paralegal at the law firm of Hunton & Williams LLP, attorneys for Plaintiff Homeward Residential, Inc.

On April 3, 2014, I served a true copy of the attached Plaintiff's Notice of Motion for Reconsideration, on all counsel of record registered with the Court's ECF system, by electronic service via the Court's ECF transmission facilities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2014.

/s/ Raymond E. Galbraith
Raymond E. Galbraith

TO: James Goldfarb, Esq.
MURPHY & McGONIGLE, P.C.
1185 Avenue of the Americas, 21st Floor
New York, NY 10036
Email: jgoldfarb@mmlawus.com

Jeffrey W. Kilduff, Esq.
Robert M. Stern, Esq.
O'MELVENY & MEYERS LLP
1625 Eye Street, NW
Washington, DC 20006
Email: jkilduff@omm.com

Daniel T. Brown, Esq.
MURPHY & McGONIGLE, P.C.
555 13th Street, NW
Suite 410W
Washington, DC 20004
Email: daniel.brown@murphymcgonigle.com

Jessica L. Thorn, Esq.
O'Melveny & Myers LLP
1625 Eye Street, N.W.
Washington, DC 20006
Email: jthorn@omm.com

Lauren M. Moore, Esq.
O'Melveny & Myers LLP
1625 Eye Street, N.W.
Washington, DC 20006
Email: lmoore@omm.com

Robert M. Stern, Esq.
O'Melveny & Myers LLP (DC)
1625 Eye Street, NW
Washington, DC 20006
Email: rstern@omm.com

Soren Elliot Packer, Esq.
Murphy & McGonigle, P.C.
1185 Avenue of the Americas, 21st Floor
New York, NY 10036
Email: spacker@mmlawus.com

Attorneys for Defendant Sand Canyon Corporation